

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION A**

IN THE MATTER OF

LARRY D. DOYLE
BRENDA S DOYLE,

DEBTORS

IN PROCEEDINGS
UNDER CHAPTER 13

CASE NO. 21-07987
JUDGE: Timothy A. Barnes

NOTICE OF FILING

Notified via Electronic Filing

U.S. Trustee, Patrick S Layng, 219 S Dearborn St, Room 873, Chicago, IL 60604

M.O. Marshall, 55 E. Monroe St., Ste. 3850, Chicago, IL 60603

David Freydin, Law Offices of David Freydin Ltd, 8707 Skokie Blvd, Suite 312, Skokie, IL 60077

Notified via US Postal Service

Larry D. Doyle, 20024 Overland Trail, Olympia Fields, IL 60461

Brenda S Doyle, 20024 Overland Trail, Olympia Fields, IL 60461

Please take notice that on the 4th day of August, 2021 I did file with the Clerk of the United States Bankruptcy Court, 219 S Dearborn, Chicago, IL 60604 the Objection to Confirmation of Plan.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that he/she caused a true and correct copy of the above and foregoing document to be served upon the following on 8/4/21:

Respectfully Submitted,

/s/ Michael N. Burke
Richard B. Aronow 3123969
Michael N. Burke 6291435
Mike Kalkowski 6185654
LOGS Legal Group LLP
2121 Waukegan Road, Suite 301
Bannockburn, IL 60015
(847) 291-1717
Attorneys for Movant
17-085462

Notified via Electronic Filing

U.S. Trustee, Patrick S Layng, 219 S Dearborn St, Room 873, Chicago, IL 60604
M.O. Marshall, 55 E. Monroe St., Ste. 3850, Chicago, IL 60603
David Freydin, Law Offices of David Freydin Ltd, 8707 Skokie Blvd, Suite 312, Skokie, IL 60077

Notified via US Postal Service

Larry D. Doyle, 20024 Overland Trail, Olympia Fields, IL 60461
Brenda S Doyle, 20024 Overland Trail, Olympia Fields, IL 60461

The firm of LOGS Legal Group LLP is a debt collector. This is an attempt to collect a debt. Any information may be used for that purpose. If your personal liability for this debt has been extinguished, discharged in bankruptcy or if a court order prohibits collecting this debt from you personally, then this is an attempt to enforce the Movant's rights with respect to the property addressed herein, and it is not an attempt to collect the debt from you personally.

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION A**

IN THE MATTER OF

LARRY D. DOYLE
BRENDA S DOYLE,

DEBTORS

IN PROCEEDINGS
UNDER CHAPTER 13

CASE NO. 21-07987
JUDGE: Timothy A. Barnes

OBJECTION TO CONFIRMATION OF THE PLAN

NOW COMES the Movant, Carrington Mortgage Services, LLC, by and through its attorneys, LOGS Legal Group LLP, and states as follows:

1. This case was filed on June 30, 2021. On June 30, 2021 Debtors filed a plan.
2. Movant, a secured party in interest, holds a note (or services a loan) secured by a mortgage on the real property located at 20024 Overland Trail, Olympia Fields, IL 60461 dated February 7, 2012.
3. The estimated pre-petition arrearages due the Movant total \$114,001.25.
4. The Debtors' plan provides that the Trustee is to pay the Movant \$62,000.00 as and for its arrearage claim.
5. The proposed plan impermissibly modifies the rights of Movant to receive all funds due it, thereby violating 11 U.S.C. §1322(b)(2) and 11 U.S.C. §1322 (b)(5).
6. Furthermore, the proposed plan provides for total funding over its term in the amount of \$123,000.00 with estimated payments to the Trustee in the amount of \$120,298.27. As the arrears owed to Movant are understated by \$52,001.25, the plan is underfunded and unfeasible on its face.
7. Such violations render the plan unconfirmable as a matter of law.

WHEREFORE, Carrington Mortgage Services, LLC prays that confirmation of the plan be denied and for such other relief as the Court deems just.

Respectfully submitted,

/s/ Michael N. Burke
Attorney for Carrington Mortgage Services, LLC

Richard B. Aronow 3123969
Michael N. Burke 6291435
Mike Kalkowski 6185654
LOGS Legal Group LLP
2121 Waukegan Road, Suite 301
Bannockburn, IL 60015
(847) 291-1717
Attorneys for Movant

The firm of LOGS Legal Group LLP is a debt collector. This is an attempt to collect a debt. Any information may be used for that purpose. If your personal liability for this debt has been extinguished, discharged in bankruptcy or if a court order prohibits collecting this debt from you personally, then this is an attempt to enforce the Movant's rights with respect to the property addressed herein, and it is not an attempt to collect the debt from you personally.

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION A**

IN THE MATTER OF

LARRY D. DOYLE
BRENDA S DOYLE,

DEBTORS

IN PROCEEDINGS
UNDER CHAPTER 13

CASE NO. 21-07987
JUDGE: Timothy A. Barnes

ORDER DENYING CONFIRMATION OF THE PLAN

THIS CAUSE, coming on to be heard on the Objection to Confirmation of the Debtors' Plan filed by Carrington Mortgage Services, LLC, the Court having jurisdiction and being advised in the premises, and due notice having been given;

IT IS HEREBY ORDERED that confirmation of the plan is denied.

Dated: _____

Entered: _____
Bankruptcy Judge

Richard B. Aronow 3123969
Michael N. Burke 6291435
Mike Kalkowski 6185654
LOGS Legal Group LLP
2121 Waukegan Road, Suite 301
Bannockburn, IL 60015
(847) 291-1717
Attorneys for Movant
17-085462